



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
David Emme, Administrator

June 10, 2015

Mr. Dante Rodriguez  
Remedial Project Manager  
US EPA Region 9 (SFD-8-2)  
75 Hawthorne St.  
San Francisco, CA 94105

RE: Anaconda/Yerington Mine Site  
Arimetco Operable Unit 8  
Focused Feasibility Study - Conceptual Closure Plan

Dear Mr. Rodriguez:

On behalf of the Nevada Division of Environmental Protection (NDEP), SRK has completed the Focused Feasibility Study - Conceptual Closure Plan (Plan) for Arimetco Operable Unit 8 (OU-8). The Plan is available as a final electronic version for you and the individuals copied on this letter. The Plan has been uploaded to the EPA web site <https://sites.tetrattech.com/projects/103-epanevada/default.aspx> and can be accessed through the following file path: **Document Library, Anaconda Copper Mine, Yerington, Nevada > Public Documents > OU-8, Arimetco Facilities > 20150401 Yerington OU-8 CCP Final with appendices**

The Plan builds on the US Environmental Protection Agency (EPA) May 2012 *Draft Final Feasibility Study for Arimetco Facilities Operable Unit 8 Heap Leach Pads and Drain-down Fluids* (Draft Final Feasibility Study). As described in the Draft Final Feasibility Study, Alternatives 6a and 8a were qualitatively assessed to be more favorable than other retained alternatives with respect to the National Contingency Plan threshold criteria (i.e. Overall Protection of Human Health and the Environment and Compliance with Surface Water and Soil Applicable Relevant and Appropriate Requirements). The Plan refines the description of these Alternatives into a proposed preliminary engineering design and provides more specific cost estimates.

Since the Plan is a preliminary engineering design and not a final remedy decision, there are a number of steps to complete and issues to be resolved either prior to final selection of a remedial alternative or during preparation of a final remedial design. We list those items below and what phase we expect them to be addressed in the future.

Steps Prior to Remedy Selection:

- Completion of the Human Health Risk Assessment that has already been initiated.
- Consideration of any alternatives substantively different from the enclosed Plan, keeping in mind that a different plan will require more study, and the time necessary to study and implement a different plan may be constrained by current fluid management capacity limitations.

Remedy Selection Phase:

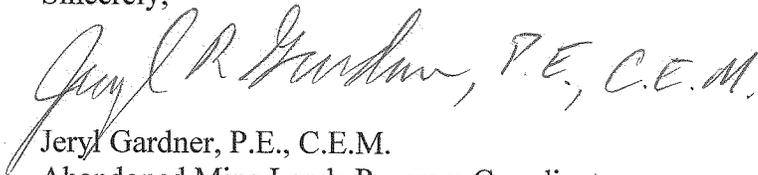
- Development of a Proposed Plan, after funding for remedy construction and operation is identified.
- Provide an opportunity for the public to review and comment on the Proposed Plan, schedule a public meeting, and make any necessary changes to the Proposed Plan based on stakeholder comments that may affect scope, performance, or cost of the remedy.

Remedial Design Phase:

- The Plan is currently a 50% design plan that allows for future design criteria to be developed and discussed between stakeholders and decisions to be made that may affect cost.
- Additional storm water routing and fluid storage design considerations will be discussed and decided upon prior to or during the remedial design phase.
- Borrow source material discussions and decisions will be completed prior to or during the remedial design phase.
- Potential phasing of closure actions will be discussed with respect to the highest to lowest priority heap leach pads and solution ponds, based on fluid management volumes and cost estimates for closure.

Draft versions of the Plan were provided to project stakeholders representing Atlantic Richfield Company, Singatse Peak Services, and Yerington Paiute Tribe and their input was considered in revisions to the Plan.

Sincerely,



Jeryl Gardner, P.E., C.E.M.  
Abandoned Mine Lands Program Coordinator  
NDEP – Bureau of Corrective Actions

ec: Harold Ball, EPA, Ball.Harold@epa.gov  
Jack Oman, ARC, Jack.Oman@bp.com  
Ron Halsey, ARC, ronald.halsey@bp.com  
Brian Johnson, ARC, brian.s.johnson@bp.com  
Taurus Massey, SPS, tmassey@singatsepeakservices.com  
Steve Dischler, SPS, sdischler@quattera.com  
Linda Howard, YPT, chairman@ypt-nsn.gov  
Ginny Hatch, YPT, ghatch@ypt-nsn.gov  
Jim Sanford, MVEC, sunny091929@aol.com  
Peggy Pauly, YCAG, preacherpauly@earthlink.net  
Dan Newell, City of Yerington, manager@yerington.net  
Jeff Page, Lyon County, jpage@lyon-county.org  
Bruce Goff, FMI, bruce\_goff@fmi.com  
Stuart Brown, FMI, stuart\_brown@fmi.com  
Breese Burnley, SRK, bburnley@srk.com  
Randy Miller, BAI, rlmiller@broadbentinc.com  
Chuck Zimmerman, BC, CZimmerman@brwncald.com